

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CLAYTON RICHARD GORDON,
GUSTAVO RIBEIRO FERREIRA,
VALBOURN SAHIDD LAWES, and
NHAN PHUNG VU, on behalf of
themselves and others similarly situated,

Civ. No. 13-30146

Plaintiff-Petitioners,

v.

JEH CHARLES JOHNSON,¹ ET AL.,

Defendant-Respondents.

MOTION FOR ORDER TO SHOW CAUSE

Plaintiff-Petitioners Gustavo Ferreira, Valbourn Lawes, and Nhan Vu respectfully move under 28 U.S.C. § 2243 that this Court order the government to promptly show cause why their petitions for writ of habeas corpus should not be granted based on this Court's prior legal ruling in this case. See ECF No. 47. The claims of Ferreira, Lawes, and Vu are identical to that of Plaintiff-Petitioner Clayton Richard Gordon, whose petition for writ of habeas corpus this Court has already granted. Id. Ferreira, Lawes, and Vu's unlawful mandatory detention has brought tremendous hardship upon their families. For the reasons described in the attached memorandum, this Court should order that the government promptly show cause why these three Plaintiffs are not entitled to the relief sought, an individualized bond hearing to determine if they pose a

¹ Jeh Charles Johnson was sworn as Secretary of Homeland Security on December 23, 2013. Pursuant to Federal Rule of Civil Procedure 25(d), he is automatically substituted for former Acting Secretary Rand Beers (who was himself substituted for former Secretary of Homeland Security Janet Napolitano) as a defendant in this matter.

Answered. For the reasons set forth in Oct. 19, Respondents are hereby ordered to provide these three Petitioners with an individualized bond hearing no later than March 28, 2014. Michael R. Powers CPT 2-7-14